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 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 SAN FRANCISCO DIVISION

13 JEWISH LEGAL NEWS, INC., Plaintiff, ) No. 3:23-cv-06241-LJC  
 14 v. )  
 15 U.S. CUSTOMS AND BORDER )  
 PROTECTION AND U.S. IMMIGRATION )  
 AND CUSTOMS ENFORCEMENT, )  
 16 Defendants. ) **STIPULATION MODIFYING MEET &**  
 17 ) **CONFER and BRIEFING SCHEDULE;**  
 18 ) **[Proposed] ORDER**  
 19 )  
 \_\_\_\_\_)

20 Plaintiff and Defendant, by their attorneys of record (“The Parties”), hereby stipulate as follows:

21 WHEREAS, Plaintiff filed the Complaint in this Freedom of Information Act (“FOIA”) lawsuit  
 22 on December 4, 2023. Dkt. No. 1;

23 WHEREAS, the Parties filed two Joint Case Management Statements in this case on February  
 24 24, 2024 and August 8, 2024, which included stipulated requests to continue the Initial Case  
 25 Management Conference that were granted by this Court. Dkt. Nos. 18-21;

26 WHEREAS, this Court granted the Parties’ stipulated request on December 2, 2024 to continue  
 27 the Initial Case Management Conference from December 12, 2024 at 1:30 p.m. to February 27, 2025 at  
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STIPULATION; **[Proposed]** ORDER

Case No.: 3:23-cv-06241-LJC

1 1:30 p.m. Dkt. Nos. 24, 25.

2 WHEREAS, this Court granted the Parties' stipulated request on January 21, 2025 to continue  
3 the Initial Case Management Conference from February 27, 2025 at 1:30 p.m. to March 27, 2025 at 8:30  
4 p.m. Dkt. Nos. 28, 29;

5 WHEREAS, in response to this Court's text order dated March 21, 2025, the Parties proposed a  
6 briefing schedule for cross motions for summary judgment, which this Court granted on April 2, 2025  
7 and included, among other deadlines, an April 30, 2025 deadline for Defendants to produce a *Vaughn*  
8 index in response to select withholdings identified by Plaintiff. Dkt. Nos. 35-37;

9 WHEREAS, Defendant CBP recently became aware of an additional, potentially responsive  
10 document requiring review in advance of completing the *Vaughn* index;

11 THE PARTIES HEREBY STIPULATE AND REQUEST, pursuant to Civil Local Rule 6-1(b),  
12 that the existing *Vaughn*, meet and confer and briefing dates be modified as follows:

- 13 • Defendant's *Vaughn* index is due by May 7, 2025;
- 14 • The Parties shall meet and confer by May, 17 2025;
- 15 • Defendants shall file their motion for summary judgment by May 30, 2025;
- 16 • Plaintiff shall file its opposition to Defendant's motion for summary judgment and cross  
17 motion for summary judgment by June 13, 2025, the combined page limit for both briefs  
18 shall be 30 pages;
- 19 • Defendants shall file their reply in support of its motion for summary judgment and  
20 opposition to Plaintiff's cross-motion for summary judgment by June 27, 2025, the  
21 combined page limit for both briefs shall be 25 pages;
- 22 • Plaintiff shall file its reply in support of its motion for summary judgement by July 4,  
23 2025, and;
- 24 • The hearing on cross motions for summary judgment shall be extended two (2) weeks  
25 from July 9, 2025 at 9:30 a.m. to July 23, 2025 at 9:30 a.m..

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1 Respectfully submitted,

2 DATED: April 28, 2025

JAVITCH LAW OFFICE

3 /s/ *Mark L. Javitch*\*

4 MARK L. JAVITCH

5 Attorney for Plaintiff

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8 DATED: April 28, 2025

PATRICK D. ROBBINS  
9 Acting United States Attorney

10 /s/ *Andrew Mainardi*

11 BY: ANDREW MAINARDI  
Assistant United States Attorney  
Attorneys for Defendants

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14 \*In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury  
that counsel for Plaintiff has concurred in the filing of this document.

**[PROPOSED] ORDER**

Pursuant to the above stipulation, IT IS SO ORDERED.

Dated: May 1, 2025

  
Hon. Lisa J. Cisneros